To: Lee, Alana[lee.alana@epa.gov]; Manzanilla, Enrique[Manzanilla.Enrique@epa.gov]; Zito, Kelly[ZITO.KELLY@EPA.GOV]; Lyons, John[Lyons.John@epa.gov]; Tenley, Clancy[Tenley.Clancy@epa.gov]; Meer, Daniel[Meer.Daniel@epa.gov]; Hiatt, Gerald[Hiatt.Gerald@epa.gov]; MORASH, MELANIE[morash.melanie@epa.gov]; Dreyfus, Bethany[Dreyfus.Bethany@epa.gov]; Hiett, Richard[Hiett.Richard@epa.gov]; Shaffer, Caleb[Shaffer.Caleb@epa.gov]; Kennedy, John[Kennedy.John@epa.gov]
Cc: Serda, Sophia[Serda.Sophia@epa.gov]; Wilson, Patrick[Wilson.Patrick@epa.gov]
From: Stralka, Daniel
Sent: Mon 1/27/2014 9:56:06 PM
Subject: RE: FYI - Article on TCE in Environmental Protection e-Magazine - A Perfect Storm Batters Risk Management Decisions for TCE - Jan 15, 2014
MAIL_RECEIVED: Mon 1/27/2014 9:56:10 PM

As Rusty pointed out, this guy may not have all his facts correct. Here are a few.

1. The Johnson et al developmental study was indeed over 22 days. That is the gestation period for rats. The human equivalent is 38 weeks (~270 days). The critical effect is indeed fetal heart development. Heart organogenesis occurs in mammals in the first trimester, 7-8 days for the rat, 12-13 weeks for humans. The human fetal heart develops in a critical 3 week window, 21 days during the first trimester.

2. ATSDR intermediate exposure risk level 21 ug/m3??? It seems that he has a conversion factor off. ATSDR in their Jan 2013 Tox Profile addendum sites the 0.0004 ppm reference concentration from EPA as the MRL (Minimum Risk Level) which would convert to 2.1 ug/m3 not 21 ug/m3.

3. By definition, fetal developmental effects cannot be chronic, however, EPA's toxicity review of TCE sites several types of non cancer effects that have similar candidate RfCs. So there are effects seen with different exposure times, both chronic and less-than-lifetime exposure periods that support similar RfCs.

4. Neither ATSDR nor EPA are applying the RfC as an acute value. ATSDR does not list an acute value, only the intermediate (15-365 days) as the 2 ug/m3 and cite, based on the EPA's pharmacokinetic model, this would be protective of developmental effects as well.

Just a few of the facts.

From: Lee, Alana
Sent: Monday, January 27, 2014 7:42 AM
To: Manzanilla, Enrique; Zito, Kelly; Lyons, John; Tenley, Clancy; Meer, Daniel; Stralka, Daniel; Hiatt, Gerald; MORASH, MELANIE; Dreyfus, Bethany; Hiett, Richard; Shaffer, Caleb; Kennedy, John
Subject: FYI - Article on TCE in Environmental Protection e-Magazine - A Perfect Storm Batters Risk Management Decisions for TCE - Jan 15, 2014

From: Kapuscinski, Rich
Sent: Monday, January 27, 2014 9:27 AM
To: Foster, Stiven; Raffaele, Kathleen; Bussard, David; Barone, Stan; Gartner, Lois
Subject: Article on TCE in Environmental Protection e-Magazine, FYI

In a recent article (see hyperlink below), EPA is chastised for not issuing national guidance on TCE and short-term exposures and for Regional positions that are alleged to be inconsistent with OPPT's interpretation of the dose-response data.

Rich Kapuscinski

From: Stalcup, Dana
Sent: Thursday, January 23, 2014 1:00 PM
To: Woolford, James; Barr, Pamela; Scozzafava, MichaelE; Kapuscinski, Rich
Subject: interesting article on TCE activities

http://eponline.com/articles/2014/01/15/a-perfect-storm-batters-risk-management-decisions-for-tce.aspx

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Dana Stalcup

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